

# Exhibit A

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(Space above this line reserved for recording office use)

**Document Title:** NOTICE OF INTENT TO EXPUNGE RECORDING OF LIS PENDENS  
(Mortgage, Deed, Etc.)

**Return Document To / Prepared By:**

Oliver M. Kiefer, Esq., DLA Piper LLP (US)

4365 Executive Drive, Suite 1100, San Diego, CA 92121

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1 OLIVER M. KIEFER (SBN 332830)  
 2 *oliver.kiefer@us.dlapiper.com*  
 3 **DLA PIPER LLP (US)**  
 4 4365 Executive Drive, Suite 1100  
 5 San Diego, California 92121-2133  
 6 Telephone: 858.677.1400  
 7 Facsimile: 858.677.1401

5 Attorneys for Receiver  
 6 Kenneth R. Jones

I hereby certify that the annexed  
 instrument is a true and correct copy of  
 the original on file in my office.

ATTEST: KEITH HOLLAND

Clerk, U. S. District Court  
 Eastern District of California

By *AHC* Deputy Clerk  
 Dated *07/10/25*

8 **UNITED STATES DISTRICT COURT**  
 9 **EASTERN DISTRICT OF CALIFORNIA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CB SURETY LLC, et al.,

15 Defendants.

Case No. 2:23-cv-02812-TLN-DB

(Assigned to Hon. Troy L. Nunley)

**NOTICE OF INTENT TO EXPUNGE  
 RECORDING OF LIS PENDENS**

Recorded Owners:  
 A&A Gastwirth Trust  
 Gastwirth Aric Trust  
 Gastwirth Annette Trust

18 NOTICE IS HEREBY GIVEN that on August 20, 2024, the Receiver recorded  
 19 a Lis Pendens with the Volusia County Recorder, as Document Number 2024162073,  
 20 for real property located at 1428 New Bolton Drive, Port Orange, Florida 32129, APN  
 21 630617000960. A copy of the recorded lis pendens is attached hereto as Exhibit A.

22 The Receiver now hereby notifies the Court and all Parties that Exhibit A shall  
 23 be expunged. A copy of this Notice shall be filed with the Volusia County Recorder.  
 24 The Receiver shall file a further Notice of Recording of the Expungement of Lis  
 25 Pendens once this Notice of Expungement has been recorded by the Volusia County  
 26 Recorder.

27 This Notice of Expungement follows the Court's issuance of a Permanent  
 28 Injunction in this matter as to Reseller Consultants, Inc., Run it Up, Inc., Won it All,

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1 Inc, Ambragold, Inc., and Aric Gastwirth. *See* ECF No. 110.

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3 Dated: June 16, 2025

**DLA PIPER LLP (US)**

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By: /s/ Oliver M. Kiefer

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Oliver M. Kiefer  
Attorneys for Receiver

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of June, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all participants in the case who are registered CM/ECF users.

/s/ Oliver M. Kiefer

Oliver M. Kiefer

*Attorney for Receiver,  
Kenneth Jones*

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# Exhibit A

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Instrument #2024142073 Doc: 6572 Page: 4516  
Electronically Recorded By  
Volusia County Clerk of the Court

1 OLIVER M. KIEFER (SBN 332830)  
 2 *oliver.kiefer@us.dlapiper.com*  
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5 Attorneys for Receiver  
 6 Kenneth R. Jones

I hereby certify that the annexed  
 instrument is a true and correct copy of  
 the original on file in my office.

ATTEST: KEITH HOLLAND

Clark, U. S. District Court  
 Eastern District of California

By: *J. Mena-Sanchez* Deputy Clerk

Dated: 8/8/2024

8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

10  
 11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CB SURETY LLC, et al.,

15 Defendants.

Case No. 2:23-cv-02812-TLN-DB

(Assigned to Hon. Troy L. Nunley)

**NOTICE OF LIS PENDENS**

Action Filed: December 1, 2023

Trial Date: Not scheduled

17 YOU ARE HEREBY NOTIFIED that on or about December 1, 2023, suit was  
 18 instituted by UNITED STATES OF AMERICA, Plaintiff, against THOMAS EIDE,  
 19 TRAVIS SMITH, CB SURETY LLC, PEAK BAKERY LLC, CASCADES POINT  
 20 AT CLEMSON LLC, KP TESTING LLC, STEPHEN CHRISTOPHER, MOTION  
 21 MEDIA MARKETING INC., SJC FINANCIAL SERVICES INC., ARIC  
 22 GASTWIRTH, RESELLER CONSULTANTS INC., AMBRAGOLD INC., BRYAN  
 23 BASS, THINK PROCESSING LLC and BASS BUSINESS CONSULTANTS  
 24 (collectively, "Defendants"). The suit, as of April 17, 2024, involves a request for a  
 25 permanent injunction and other equitable relief regarding certain assets of the above-  
 26 named Defendants, including the following described property located in the County  
 27 of Volusia, State of Florida, which is commonly described as 1428 New Bolton Drive,  
 28 Port Orange, Florida 32129 (the "Property"). The Property is a residential property

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1 with a legal description as follows:

2 Lot 96 Sunrise Oaks PUD Phase III MB 48 PG 102 PER OR 5293 PG  
3 0666 PER OR 5599 PG 0414 PER OR 7911 PG 0438 PER OR 7982 PG  
4 2666 PER OR 8015 PG 4493

5 Assessor Parcel No. 630617000960

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7 Dated: April 18, 2024

**DLA PIPER LLP (US)**

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By: /s/ Oliver M. Kiefer

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Oliver M. Kiefer  
Attorneys for Receiver

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